



## Gram Car Carriers ASA

### Supplier Code of Conduct

(adopted by the board of directors on 7 April 2023, updated per 7 February 2024)

Gram Car Carriers ASA, its subsidiaries and affiliates ("**Gram**") require that its suppliers maintain minimum standards when supplying products and services to Gram.

#### Current Laws

Gram suppliers shall comply with applicable laws and legislation in the countries in which they operate.

#### Human Rights

Gram suppliers shall respect human rights as set out in section 5 ("Human and Labor Rights") of our Code of Conduct. Gram will not tolerate abuse of human rights in our operations or our supply chain. Our Human Rights Policy is guided by the principles set out in the United Nations Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises, and we recognise all human rights set out in the International Bill of Rights and the ILOs Core Labour Conventions regarding child labour, forced labour, freedom of association, the right to organise and bargain collectively, equal pay, and non-discrimination in the workforce.

Gram suppliers shall comply with all applicable laws pertaining to fair employment practices, as well as laws prohibiting forced and compulsory labour, child labour, employment discrimination, slavery and human trafficking. Where human rights set a higher standard than the national law, the human rights standard should be followed. Where national law makes it impossible to follow human rights standards, our suppliers should follow the national law while working to uphold and promote their human rights commitments.

#### Safety and Environment

Gram suppliers are expected to follow safe work procedures and practices and the standards set out in section 4 ("Health and safety") of our Code of Conduct . We expect our suppliers to abide by local laws as a minimum and maintain a high level of safety in their facilities, products, and services, with particular attention to protecting employees, contractors, customers and the local environment.

Gram suppliers should conduct their activities in line with section 6 ("Environment") of our Code of Conduct and in such a manner that minimises their negative environmental impacts. Our suppliers must operate in line with environmental legislation in force in each country of operation.

#### Anti-corruption

Gram suppliers shall comply with all relevant anti-bribery legislation. Our suppliers shall not offer, promise or give anything of value to a Government Official to obtain or retain "business" or secure any improper business advantage. "Government officials" includes more than just high-level government

officials, and includes low-level government employees such as customs or immigration clerks, employees of national companies and sometimes of joint ventures between national companies and private companies.

Economic Sanctions and Trade Control

Gram suppliers shall take steps to ensure they do not conduct business in or with a sanctioned country, territory, group, organization or individual. Where Gram suppliers become aware of any person or entity within their supply chain or wider business operations who is or may be subject to sanctions, they shall immediately notify their Gram contact person to discuss appropriate action. Further, Gram suppliers shall apply with applicable export control laws and regulations.

Violations of the Supplier Code

Violations of this Code by our suppliers will have varying consequences to the supplier’s contractual relationship with Gram depending on the severity of the violation. These can range from a warning to outright disqualification as a Gram supplier, without prejudice to other applicable legal or administrative actions and remedies.

The Chief Compliance Officer takes ownership for this policy and has responsibility for its implementation. This policy will be reviewed every year.

Signed

CEO of Company: Georg A. Whist

Date: 7 February 2024

Board approval date: 7 February 2024

Version	Date	
1	7 April 2023	Approved by the Board of Directors of Gram Car Carriers ASA
2	7 February 2024	Approved by the Board of Directors of Gram Car Carriers ASA